

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JUNZHOU HUANG,

Plaintiff,

v.

Partnerships and Unincorporated Associations
identified in Schedule A

Defendants.

Case No.: 22-cv-00809

JURY TRIAL DEMANDED

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S *EX PARTE*
MOTION TO EXTEND THE TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65(b)(2) of the Federal Rules of Civil Procedure and the Court's inherent power to effectuate its own orders, Plaintiff Junzhou Huang ("Plaintiff") seeks to extend the Temporary Restraining Order granted and entered by the Court on October 17, 2022 ("TRO") [33] for a period of fourteen (14) days until November 14, 2022.

This Court entered the TRO against the Defendants identified on Schedule A to the Complaint on October 17, 2022. [33]. As of October 28, 2022, the third parties have not completed effectuating the TRO. Declaration of Haoyi Chen at ¶ 2. Plaintiff plans to freeze financial accounts identified by the third parties. *Id.*

Rule 65(b)(2) states that a temporary restraining order entered without notice may be extended provided a party can show, prior to expiration of the order, good cause for such an extension. Fed. R. Civ. P. 65(b)(2). In this case, there is good cause to extend the TRO because there is a high probability the Defendants will continue to harm Plaintiff without the TRO in place.

Specifically, Defendants will likely attempt to move any assets from their financial accounts to offshore accounts. As discussed in Plaintiff's Memorandum in Support of its *Ex Parte* Motion for Entry of a Temporary Restraining Order, and as found by the Court in granting the TRO, this possibility of harm is significant. Accordingly, in the interest of justice, extension of the TRO is necessary. In light of the above, Plaintiff respectfully requests that the TRO be extended for a period of fourteen (14) days until November 14, 2022.

DATED October 28, 2022.

Respectfully submitted,

/s/ Zhangyuan Ji

Shen Wang (ILND Bar No. 6314224)

Hao Tan (ILND Bar No. 6314119)

Haoyi Chen (*pro hac vice* application to be sought)

Zhangyuan Ji (ILND Bar No. 6336107)

ARCH & LAKE LLP

203 North LaSalle Street

Suite 2100

Chicago, Illinois 60601

636-236-5390 (Shen Wang)

312-375-9408 (Hao Tan)

346-335-9890 (Haoyi Chen)

773-680-9572 (Zhangyuan Ji)

shenwang@archlakelaw.com

haotan@archlakelaw.com

haoyichen@archlakelaw.com

ellen@archlakelaw.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the October 28, 2022, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Zhangyuan Ji
Zhangyuan Ji
ARCH & LAKE LLP
203 North LaSalle Street
Suite 2100
Chicago, Illinois 60601
773-680-9572
ellen@archlakelaw.com